

1 SUE FAHAMI  
2 Acting United States Attorney  
3 Nevada Bar No. 5634  
4 STEVEN J. ROSE  
5 Assistant United States Attorney  
6 Nevada Bar No. 13575  
7 501 Las Vegas Boulevard South, Suite 1100  
8 Las Vegas, Nevada 89101  
9 (702) 388-6336  
10 Steven.Rose@usdoj.gov  
11 *Attorneys for the United States of America*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 United States of America,  
16 Plaintiff,  
17 v.  
18 CLIFFORD SANCHEZ,  
19 Defendant.

2:23-cr-00194-JCM-MDC

20 **Order to Continue Response**  
21 **Deadline on Motion to Suppress**  
22 **Statements and Evidence**  
23 **(First Request)**

24 It is hereby stipulated and agreed, by and between SUE FAHAMI, Acting United States Attorney, and Steven J. Rose, Assistant United States Attorney, counsel for the United States of America, Rene L. Valladares, Federal Public Defender, and JOANNE DIAMOND, Assistant Federal Public Defender, counsel for defendant Clifford Sanchez, that the deadline for the Government's response to defendant's Motion to Suppress (ECF No. 43) scheduled for February 14, 2025, be continued to February 28, 2025. In support of this request, the parties state the following:

25 1. On May 2, 2023, a Complaint was filed charging defendant with Distribution

1 of Child Pornography. ECF No. 1.

2 2. On October 17, 2023, a grand jury returned an indictment charging defendant  
3 with Coercion and Enticement, Distribution of Child Pornography, and Possession of Child  
4 Pornography. ECF No. 22.

5 3. Following several continuances, trial is currently set for April 21, 2025. ECF  
6 No. 42. Motions were due on January 31, 2025, and responses by February 28, 2025. *Id.*

7 4. On January 31, 2025, defendant filed a Motion to Suppress Statements and  
8 Evidence. ECF No. 43.

9 5. Because of Government counsel's work obligations and work travel, counsel  
10 for the Government asked counsel for defendant for an extension of the deadline to respond  
11 to the motion, and counsel for defendant graciously agreed. The parties stipulate that the  
12 Government's response to the Motion will be set for Friday, February 28, 2025. The short  
13 delay is not anticipated to affect the current trial setting. This additional time also accounts

14

15

16

17

18

19

20

21

22

23

24

1 for the exercise of due diligence, in the interest of justice, and is not for the purposes of  
2 delay.

3 Respectfully submitted this 11th day of February 2025.

4  
5 SUE FAHAM  
6 Acting United States Attorney

7 /s/ Steven J. Rose  
8 STEVEN J. ROSE  
9 Assistant United States Attorney

10 /s/ Joanne Diamond  
11 JOANNE DIAMOND  
12 Assistant Federal Public Defender  
13 Counsel for Defendant,  
14 CLIFFORD SANCHEZ

15 IT IS SO ORDERED.

16 February 14, 2025  
17 Dated: \_\_\_\_\_

18  
19  
20  
21  
22  
23  
24  
HON. MAXIMILIANO D. COUVILLIER, III.  
UNITED STATES MAGISTRATE JUDGE